

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

In Re Pet Foods Products Liability Litigation ) Civil Action No. 07-2867 (NLH)  
 )  
 ) MDL Docket No. 1850

**NOTICE OF MOTION**

Pursuant to Rule 23(g) of the Federal Rules of Civil Procedure, as set forth in Plaintiffs' Memorandum of Law in support of this Motion, Plaintiffs in the following cases: *Cashman v. Menu Foods Midwest Corp., et al.*, No. 07-cv-3236 (S.D.N.Y); *Johnson v. The Procter and Gamble Co., et al.*, No. 07-C-0159-C (W.D. Wis.); *Rozman v. Menu Foods Midwest Corp., et al.*, No. 07-1808 (D. Minn.); *Connerton v. Menu Foods Corp., et al.*, No. 07-CV-10797 (D. Mass.); and *Tompkins v. Menu Foods Midwest Corp., et al.*, No. 1:07-cv-00736-JLK (D. Colo.) hereby move this Court for an order appointing Berger & Montague, P.C., Wexler, Toriseva, Wallace LLP, Coughlin Stoia Geller Rudman & Robins LLP, and Hagens Berman Sobol Shapiro LLP as Interim Counsel and Trujillo Rodriguez & Richards, LLC, as Liaison Counsel in these consolidated class actions.

Dated: September 5, 2007

Respectfully submitted,

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**



Daniel W. Krasner

Gregory Mark Nespole  
Martin E. Restituyo  
270 Madison Avenue  
New York, NY 10016  
Telephone: 212-545-4600  
Facsimile: 212-686-0114

**LARRY D. DRURY LTD.**

Larry D. Drury, Esq.  
205 W. Randolph Street, Suite 1430  
Chicago, IL 60606  
Telephone: (312) 346-7950  
Facsimile: (312) 346-5777

**PROGRESSIVE LAW GROUP, LLC**

Frank Jablonski, Esq.  
Noah Golden-Krasner, Esq.  
354 West Main Street  
Madison, WI 53703  
Telephone: (608) 258-8511  
Facsimile: (608) 442-9494

**PROGRESSIVE LAW GROUP, LLC,**

Ilan J. Chorowsky, Esq., Of Counsel  
1130 North Dearborn Street, Suite 3110  
Chicago, IL 60610  
Telephone: (312) 643-5893  
Facsimile: (312) 643-5894

**WAYNE, RICHARD & HURWITZ LLP**

Eugene R. Richard, BBO # 546781  
Howard J. Wayne, BBO # 518160  
One Boston Place, Suite 3620  
Boston, MA 02108  
Telephone: (617) 720-7870  
Facsimile: (617) 720-7877

**REINHARDT WENDORF & BLANCHFIELD**

Garrett D. Blanchfield, Jr. #209855  
Mark Reinhardt  
E-1250 First National Bank Bldg.  
332 Minnesota Street  
St. Paul, MN 55101  
Telephone: (651) 287-2100  
Facsimile: (651) 287-2103

**THOMAIDIS LAW, LLC**

Jennifer Reba Thomaidis, Esq.  
1866 Vine Street  
Denver, CO 80206  
Telephone: (303) 322-4355

**PAUL GORDON, LLC**  
Paul Gordon  
650 South Cherry Street, Suite 835  
Denver, Colorado 80246  
Telephone: (303) 756-0800